

EXHIBIT 11

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JENNIFER VIRDEN, :
Plaintiff, :
vs. : No. 1:21cv271-RP
CITY OF AUSTIN, :
Defendant. :

**VIRDEN'S FIRST SUPPLEMENTAL
RESPONSES TO DEFENDANT'S
FIRST SET OF INTERROGATORIES**

INTERROGATORIES

1. Identify all persons, other than those already listed in Part A of Plaintiff's Initial Disclosures dated March 15, 2022, who you believe have knowledge of relevant facts and identify, including for those already listed in Part A of Plaintiff's Initial Disclosures dated March 15, 2022, the issues upon which you believe they have knowledge.

Response:

No additional persons to identify at present. As to the issues upon which those persons identified in the initial disclosures have relevant knowledge, all of those persons identified other than Virden submitted verifications of their intent to contribute on the dates provided. Those persons have knowledge surrounding their intent to contribute as reflected in their verified statements.

2. For the period between December 16, 2020, and November 8, 2021, list all campaign expenditures made by you in connection with, or in furtherance of, a candidacy for the November 2022 General Election, and for each such expenditure, identify whether it was from your personal funds, a loan from you, contributions to your previous campaign, or contributions to a campaign for the November 2022 General Election.

Response:

EXHIBIT
sg 15
9/21/22 Virden

Virden objects to the extent this interrogatory presumes that a candidate can or must trace the source of funds for any given campaign or political expenditure to a particular category of funds that are commingled in a campaign account. Texas law does not require candidates to use or designate any particular accounting method or to trace funds in the manner suggested. Virden had less than \$3,800 remaining in the account after the December 2020 runoff election, as stated in her Complaint. Compl. ¶ 32. Subsequent funds deposited into the account are reflected in her campaign finance reports, which also reflect whether funds were from contributions or a loan from personal funds, or if Virden made a reportable expenditure from her own personal funds (not already deposited into the campaign account). Virden provides the campaign finance reports covering the requested period, which reflects the information responsive to the request.

3. For the period between December 16, 2020, and November 8, 2021, identify any campaign activity in which you participated.

Response:

April 9, 2021 – Virden was invited to and did speak at Westminster Austin Senior Living about City of Austin issues and the May 1, 2021 ballot measures.

4. For the period between October 17, 2017, and December 16, 2021, identify any campaign activity in which you participated, excluding any campaign activities directly in connection with your 2020 campaign for the City Council District 10 seat.

Response:

Virden collected signatures for the Save Austin Now camping ban petitions during June-July 2020 and January 2021.

5. Identify any direct campaign expenditures by you between October 17, 2017, and December 16, 2021.

Response:

Virden did not make any “direct campaign expenditures” during the relevant period.

First Supplemental Response: AustinHaus Realty paid for advertising identified under Interrogatory No. 7, below.

6. Identify any campaign contributions by you to a political committee between October 17, 2017, and December 16, 2021.

Response:

Virden made several campaign contributions to candidates in recent elections, and will supplement this response by April 22, 2022.

First Supplemental Response:

Virden made the following “campaign contributions” under the Texas Election Code:

- \$45 to Texas Realtors PAC in September 2020
- \$30 to Save Austin Now PAC in March 2021
- \$100 to Justin Berry in December 2021
- \$100 to Ellen Troxclair in December 2021
- \$400 to Rupal Chaudhari (for Travis County Judge) in late 2021

7. Identify any campaign contributions or campaign expenditures by you between October 17, 2017, and December 16, 2021, in support of a measure, or the proponents of a measure, intended to be included as a proposition on a City of Austin ballot.

Response:

Virden paid for radio advertising on KLBJ regarding certain measures on the May 1, 2021 Austin ballot.

First Supplemental Response:

AustinHaus Realty paid for radio advertising on KLBJ regarding Proposition A on the November 2, 2021 Austin ballot. These advertisements cost \$475 in the aggregate.

8. Please describe any monetary damages (nominal and compensatory) to you personally since October 17, 2017, proximately caused by the City of Austin charter and statutory provisions you challenge, as described in ¶ 1 of the Joint Federal Rule of Civil Procedure 26(f) Report And Proposed Scheduling Order (Doc. 43) in this case.

Response:

Virden is entitled to nominal damages for the violation of her speech and associational rights, even in the absence of any actual damages. *Carey v. Piphus*, 435 U.S. 247 (1978). Virden does not seek any monetary damages in her personal capacity other than nominal damages.

9. Please describe any monetary damages (nominal and compensatory) to you as a candidate since October 17, 2017, proximately caused by the City of Austin charter and statutory provisions you challenge, as described in ¶ 1 of the Joint Federal Rule of Civil Procedure 26(f) Report And Proposed

Scheduling Order (Doc. 43) in this case.

Response:

Virden is entitled to nominal damages for the violation of her speech and associational rights as a candidate, even in the absence of any actual damages. *Carey v. Piphus*, 435 U.S. 247 (1978). Virden does not seek any monetary damages in her capacity as a candidate other than nominal damages.

10. Identify any campaign communications by you in connection with the November 2022 General Election for the period between December 16, 2020, and November 8, 2021.

Response:

Constant Contact emails:

1.

Subject	Thank you!
Pre header	Please accept my sincere gratitude to all of OUR campaign supporters, who have tirelessly campaigned for me and who believed in me and our platform.
Sent	December 16th 2020 at 8:51 pm EST
Email link	https://conta.cc/3ag5Rgs

2.

Subject	** Camping Ban on the Ballot, May 1, Early Voting Apr. 19-27th **
Pre header	Save Austin Now Public Camping Ban Petition on the Ballot, May 1, Early Voting Apr. 19-27th
Sent	February 9th 2021 at 4:11 pm EST
Email link	https://conta.cc/3cTfXFr

3.

Subject	FOR IMMEDIATE RELEASE: Virden Takes Action in Federal Court
Pre header	Jennifer Virden Files First Amendment Challenge to Austin's

Campaign Blackout Period

Sent March 26th 2021 at 10:45 am EDT

Email link <https://conta.cc/3d7DK2J>

4.

Subject VOTERS GUIDE: May 1st Propositions on the Austin Ballot

Pre header Jennifer Virden on May 1st Propositions, Early Voting April 19-27th, E-Day May 1st

Sent April 13th 2021 at 9:33 am EDT

Email link <https://conta.cc/3dVzP9G>

5.

Subject REMINDER: May 1st Propositions on the Austin Ballot

Pre header Jennifer Virden on May 1st Propositions, Early Voting April 19-27th, E-Day May 1st

Sent April 25th 2021 at 6:32 pm EDT

Email link <https://conta.cc/3vnIGbt>

6.

Subject ELECTION DAY: May 1st Propositions on the Austin Ballot

Pre header YES ON PROP. B, NO ON ALL THE REST, more polling places

Sent April 30th 2021 at 9:56 pm EDT

Email link <https://conta.cc/2PHNwRE>

7.

Subject ** Save Austin Now Police Petition for Nov. Ballot **

Pre header SAFE Austin Now: Ensure Adequate Police Staffing, Double Training, Enact Reform

Sent June 13th 2021 at 1:32 am EDT

Email link <https://conta.cc/3zhiZvX>

8.

Subject ** LAST CALL: Save Austin Now Police Petition for Nov. Ballot **

Pre header SAFE Austin Now: Ensure Adequate Police Staffing, Double Training, Enact Reform

Sent July 17th 2021 at 8:00 am EDT

Email link <https://conta.cc/3iodBzz>

9.

Subject ** COVID Good News, Social Media Poll **

Pre header *Regeneron*, Candidate Poll, Position Papers

Sent August 22nd 2021 at 1:23 pm EDT

Email link <https://conta.cc/3sFlt2V>

10.

Subject ** Supporting Prop. A on the Nov. 2, 2021 Ballot **

Pre header Early Voting Starts Oct. 18th - 29th

Sent October 5th 2021 at 7:56 pm EDT

Email link <https://conta.cc/3BkoGd2>

11.

Subject ** TODAY: Election Day FOR Prop. A **

Pre header APD Police Staffing levels in CRISIS

Sent November 2nd 2021 at 6:00 am EDT

Email link <https://conta.cc/3Etphdr>

12.

Subject "I'm in!" Jennifer Virden confirms candidacy for Austin Mayor ...

Pre header Austin voters eager for change; Jennifer is the one to lead it ...

Sent November 8th 2021

Email link <https://conta.cc/3kgVCg8>

Email link <https://conta.cc/3mXVALX>

Email link <https://conta.cc/3qfL7gV>

Virden's communications on her Facebook and Twitter campaign pages are all "relating to" her November 2022 candidacy, and all of those posts are available on the respective pages, the URLs of which are provided here. Virden here specifically lists certain posts that most directly advocate or discuss her campaign or a political issue:

Facebook ("FB"), <https://www.facebook.com/jennifer4austin>:

1. Facebook Dec. 16,

2020 [https://www.facebook.com/112081817291028/posts/181118397054036
/?d=n](https://www.facebook.com/112081817291028/posts/181118397054036/?d=n)

2. FB Jan. 8,

2021 [https://www.facebook.com/112081817291028/posts/198204348678774
/?d=n](https://www.facebook.com/112081817291028/posts/198204348678774/?d=n)

3. FB Feb. 5,

2021 [https://www.facebook.com/112081817291028/posts/217183523447523
/?d=n](https://www.facebook.com/112081817291028/posts/217183523447523/?d=n)

4. FB Feb. 9,

2021 [https://www.facebook.com/112081817291028/posts/220114466487762
/?d=n](https://www.facebook.com/112081817291028/posts/220114466487762/?d=n)

5. FB Mar. 25,

2021 [https://www.facebook.com/112081817291028/posts/251395096693032
/?d=n](https://www.facebook.com/112081817291028/posts/251395096693032/?d=n)

6. FB Apr. 8,

2021 [https://www.facebook.com/112081817291028/posts/261153409050534
/?d=n](https://www.facebook.com/112081817291028/posts/261153409050534/?d=n)

7. FB Apr. 15,

2021 [https://www.facebook.com/112081817291028/posts/265927955239746
/?d=n](https://www.facebook.com/112081817291028/posts/265927955239746/?d=n)

8. FB Apr. 16,

2021 [https://www.facebook.com/112081817291028/posts/266571721842036
/?d=n](https://www.facebook.com/112081817291028/posts/266571721842036/?d=n)

9. FB Apr. 18, 2021

(1) [https://www.facebook.com/112081817291028/posts/267981551701053/?
d=n](https://www.facebook.com/112081817291028/posts/267981551701053/?d=n)

10. FB Apr. 18, 2021

(2) <https://www.facebook.com/112081817291028/posts/268009141698294/?d=n>

11. FB Apr. 30, 2021

(1) <https://www.facebook.com/112081817291028/posts/276078760891332/?d=n>

12. FB Apr. 30, 2021

(2) <https://www.facebook.com/112081817291028/posts/276128250886383/?d=n>

13. FB May 1, 2021

(1) <https://www.facebook.com/112081817291028/posts/276830417482833/?d=n>

14. FB May 1, 2021

(2) <https://www.facebook.com/112081817291028/posts/276854300813778/?d=n>

15. FB June 17,

2021 <https://www.facebook.com/112081817291028/posts/308881310944410/?d=n>

16. FB June 20,

2021 <https://www.facebook.com/112081817291028/posts/310963520736189/?d=n>

17. FB June 21,

2021 <https://www.facebook.com/112081817291028/posts/311591267340081/?d=n>

18. FB June 27,

2021 <https://www.facebook.com/112081817291028/posts/315724243593450/?d=n>

19. FB June 28,

2021 <https://www.facebook.com/112081817291028/posts/316173333548541/?d=n>

20. FB Aug. 15,

2021 <https://www.facebook.com/112081817291028/posts/349084336924107/?d=n>

21. FB Nov. 8, 2021

(1) <https://www.facebook.com/100063618503963/posts/288971843233430/?d=n>

22. FB Nov. 8, 2021

(2) <https://www.facebook.com/100063618503963/posts/289036143227000/?d=n>

23. FB Nov. 8, 2021

(3) <https://www.facebook.com/100063618503963/posts/289212949875986/?d=n>

24 FB Nov. 8, 2021

(4) <https://www.facebook.com/100063618503963/posts/289228229874458/?d=n>

Twitter, <https://twitter.com/Jennifer4Austin>:

1. [Jennifer Virden @Jennifer4Austin](#) Dec 16, 2020 <https://t.co/rJW0Y2WkcY>
2. [Jennifer Virden @Jennifer4Austin](#) Feb 2, 2021 Austin has become a magnet for the homeless under #ATXCouncil's ill conceived policies. Read the captions of these two pics, says it all. [@statesman @GregAbbott_TX 00#TXLege](https://t.co/ayD3dgmbap) <https://t.co/csnBdlypgS>
3. [Jennifer Virden @Jennifer4Austin](#) Feb 4, 2021 ON THE BALLOT! <https://t.co/ExaYFtRePE>
4. [Jennifer Virden @Jennifer4Austin](#) Feb 9, 2021 Newsletter: ** Camping Ban on the Ballot, May 1, Early Voting Apr. 19-27th ** [@ATXCouncil #SaveAustinNow #StrongMayor #BallotLanguage #TenOne">https://t.co/GceL7JMrc #ATXCouncil #SaveAustinNow #StrongMayor #BallotLanguage #TenOne](https://t.co/GceL7JMrc)
5. [Jennifer Virden @Jennifer4Austin](#) Feb 16, 2021 AUSTIN: 34 hours and counting without electricity. Fire place going and inside temp was 48 degrees. Outside temp was 10 degrees at that time. #ATXCouncil @austinenergy <https://t.co/N7o9TvpZTP>
6. [Jennifer Virden @Jennifer4Austin](#) Feb 18, 2021 National news. Adamant to camp. <https://t.co/9fCI4zHOjc> <https://t.co/zZiu8aY2H>
7. [Jennifer Virden @Jennifer4Austin](#) Mar 1, 2021 #ATXCouncil "will receive an update tomorrow (Tues) about APD's progress to overhaul recruiting and training ... We hope ... quick action to restart cadet classes. Council Work session will be on ATXN. The police training update is scheduled to begin at 1:30 p.m." via [@gacc97](#)
8. [Jennifer Virden @Jennifer4Austin](#) Mar 3, 2021 *Steve "Anyone" Adler* - TX Supreme Court REQUIRES #ATXCouncil change camping ban ballot language. (full text decision) [#ForPropB #TXLege](#) <https://t.co/lmHqCqdQoH>
9. [Jennifer Virden @Jennifer4Austin](#) Mar 5, 2021 "Clean Up Austin! Yes on Prop. B!" Vote May 1, Early Voting Apr. 19-27 #ATXCouncil #TXLege See: <https://t.co/vwgeBm8qBU>
10. [Jennifer Virden @Jennifer4Austin](#) Mar 13, 2021 I agree with the right and left. I am officially AGAINST Props D - H on the May 1st Austin Ballot - #ATXCouncil Orders Elections for Eight Propositions on May 1, 2021 | See props at: <https://t.co/BVzqvMxEQm>
11. [Jennifer Virden @Jennifer4Austin](#) Mar 23, 2021 New APD Cadets are desperately needed, as APD will have more than 100 vacant officer positions by the end of this month. "Murder was up 42%, arson up 31%, auto theft, 31%, aggravated assaults, up" Response times are significantly slower. <https://t.co/ZVNbnme25O> Pic via [@ATXPOA](#) FB <https://t.co/jtSlvYJ9fo>
12. [Jennifer Virden @Jennifer4Austin](#) Mar 25, 2021 Virden Files First Amendment Challenge to Austin's Campaign Blackout Period (full-text) [#ATXCouncil #TXLege](https://t.co/WrF7eDfKzf)
13. [Jennifer Virden @Jennifer4Austin](#) Mar 28, 2021 Predictable. #ATXCouncil <https://t.co/K4EhtOadaF>
14. [Jennifer Virden @Jennifer4Austin](#) Mar 31, 2021 All 8 Propositions (A - H) on the May 1st Austin Ballot: <https://t.co/BVzqvMxEQm> Early Voting Apr. 19-27th. All Voting Locations: [#ForPropB #YesPropB](https://t.co/3nmhrzYNAN) <https://t.co/KhXptgOwe4>
15. [Jennifer Virden @Jennifer4Austin](#) Apr 4, 2021 Are you tired of the blight, the structure fires, the needles, the litter, the tents, the increased knifing crime...the VAGRANCY? Well then, we all need to *Vote For Prop. B*, your friends and family too! Early Voting April 19th-27th, E-Day May 1. See: <https://t.co/5fcQ0MVRKm> <https://t.co/PK0Ms61AYr>
16. [Jennifer Virden @Jennifer4Austin](#) Apr 6, 2021 WARNING: 63 Officers left APD in the past 3

months. This will be a serious crisis soon if #ATXCouncil does not correct their MISTAKES quickly, BEFORE the next Cadet Class graduates... Re: <https://t.co/94DDaNIftb> #TXLege <https://t.co/JOoaaZoPpD>

17. Jennifer Virden @Jennifer4Austin Apr 7, 2021 The Truth about 'Democracy Dollars'
<https://t.co/4HyDR2l9aB> #NoPropH <https://t.co/6nko3Arkol>
18. Jennifer Virden @Jennifer4Austin Apr 7, 2021 No 'Strong Mayor'! #NoPropF #ATXCouncil
<https://t.co/N6Jvo14sTd>
19. Jennifer Virden @Jennifer4Austin Apr 7, 2021 No to Rank Choice voting! #NoPropE #ATXCouncil <https://t.co/U5LrnRlfkd> <https://t.co/TBl4PGGrFTA>
20. Jennifer Virden @Jennifer4Austin Apr 8, 2021 No need for Prop. C. #NoPropC #ATXCouncil
<https://t.co/MmbJ7atUJW> <https://t.co/jWcdq1eq7>
21. Jennifer Virden @Jennifer4Austin Apr 10, 2021 Nothing good in Austin happens after midnight, nowadays, esp. when #ATXCouncil has been understaffing the @Austin_Police by the hundreds. Check the recent posts from @ATXPOA after midnight. Truly shameful #ATXCouncil's abdication of their responsibility. #TXLege
22. Jennifer Virden @Jennifer4Austin Apr 13, 2021 VOTERS GUIDE: May 1st Propositions on the Austin Ballot. Jennifer Virden on May 1st Propositions, Early Voting April 19-27th, E-Day May 1st. (with hyperlinks) <https://t.co/EjsLo4YSoh> #VoteForPropB #YesPropB <https://t.co/oLT5uzlrh4>
23. Jennifer Virden @Jennifer4Austin Apr 13, 2021 AFTER PROP. B PASSES: "Reforming Austin's Policy on Homelessness" <https://t.co/dnUoeqljhU> #TXLege #VoteForPropB #YesPropB
24. Jennifer Virden @Jennifer4Austin Apr 16, 2021 WOW: @Statesman Editorial Board Comes out AGAINST Props: C - Change Police Oversight, E - Rank Choice Voting, F - Strong Mayor, G - 11th CM District, H - Campaign Tax Dollars. No position yet from @Statesman on B - Reinstate Camping Ban. More tomorrow with links.
25. Jennifer Virden @Jennifer4Austin Apr 16, 2021 Even the @AustinChronicle comes out Against Prop. #FtheStrongMayor! #VoteAgainstPropF #ATXCouncil <https://t.co/7r6VfqhFUO>
26. Jennifer Virden @Jennifer4Austin Apr 19, 2021 Tip to the voters. Props are in alphabetical order, but Prop. H is by itself on the second page of the ballot. Be sure to go to the second page of the ballot to vote AGAINST Prop. H. #VoteForPropB
27. Jennifer Virden @Jennifer4Austin Apr 19, 2021 Interesting. #RECA came out FOR Prop. B, and AGAINST all the APR Props D - H. #VoteForPropB
28. Jennifer Virden @Jennifer4Austin May 1, 2021 Props A-E on a path to passing. Props F-H on a path to failing. Passing so far AFA, Camping Ban, DPO, Mayoral elect date, & RCV. RCV illegal so will not go into effect.
29. Jennifer Virden @Jennifer4Austin May 1, 2021 BIGGEST LOSER OF THE NIGHT? - Greg Casar - His brain child Public Camping & Panhandling everywhere & all hours Soundly Rejected by Voters, his lust for public campaign finance to be extended to non-citizens Rejected by Voters, and his prospect as a Strong Mayor Soundly Rejected.
30. Jennifer Virden @Jennifer4Austin May 1, 2021 NOTE: Prop B passing is a SOUND REPUDIATION OF THE MAYOR AND THE ENTIRE AUSTIN CITY COUNCIL. Nevertheless, we still want a version of #HB1925 passed by the #TXLege, because #ATXCouncil cannot be counted on to implement Prop B in good faith.
31. Jennifer Virden @Jennifer4Austin May 4, 2021 I Do Not Agree with This. "3,000 housing in 3 yrs" was developed behind closed doors. The wisdom of the general public was excluded. Will be a waste of \$100's OF MILLIONS of dollars. We need temporary solutions, not permanent problems! #TXLege #ATXCouncil <https://t.co/UnzRVfLRpd>
32. Jennifer Virden @Jennifer4Austin May 4, 2021 City Hall Rebellion Against the Voters. #PropB #TXLege #ATXCouncil <https://t.co/fT6IZByIA8>
33. Jennifer Virden @Jennifer4Austin May 5, 2021 PASS IT: #HB1900 on Thurs. May 6th. Huge support in the #TXLege. Police defunding that could lead to disannexations going 30 years back! #ATXCouncil M-up. That's potentially the blues and purples on this map. #BackTheBlueTX

<https://t.co/l3OcWF9iYm>

34. Jennifer Virden @Jennifer4Austin May 6, 2021 You mess with the Bull, you get the Horns!

@safehorns

#TXLege #HB1900 #BackTheBlue #Disannexation <https://t.co/RrvMmOxiv4>

35. Jennifer Virden @Jennifer4Austin May 7, 2021 Top 4 Bills following in #TXLege to Correct ATXCouncil: 1. #HB1900 Police - Passed House, x'ing to Senate 2. #HB1925 Camping Ban - Passed House, in Senate 3. #SB23 Police - x'd to House 4. #SB14 Employment Policy - x'd to House. All moving. [@LtGovTX APPROVE #HB1900 & #HB1925!](#)

36. Jennifer Virden @Jennifer4Austin May 12, 2021 In response to #PropB, Council vote was UNANIMOUS to potentially put a City sanctioned camping/"tenting" #ClubMeth site in ALL 10 #ATXCouncil districts in Austin. Vagrancy & blight '#equity.' Need #HB1925 #TXLege.

<https://t.co/W0bHLkepiy>

37. Jennifer Virden @Jennifer4Austin May 14, 2021 More importantly, no need for a sanctioned campsite in every district. #atxcouncil <https://t.co/TBwajXZm4K>

38. Jennifer Virden @Jennifer4Austin May 14, 2021 Memo from City Manager today. Clear that cost of each sanctioned campsite would be *extremely high.* No indication of exactly where. Still the "aim of designing one candidate campsite per Council District." More to be revealed at #ATXCouncil meeting on May 18th. #HB1925 #TXLege <https://t.co/W4rMGjiRfC>

39. Jennifer Virden @Jennifer4Austin May 18, 2021 That Work Session was a cluster. They have no idea how to implement Prop. B nor how to spend the federal stimulus money resp (Item1). Not to mention the mask mandate covered earlier today that [@GovAbbott](#) struck down. #ATXCouncil is totally out of sync w/ public sentiment. #TXLege

40. Jennifer Virden @Jennifer4Austin May 20, 2021 The growing Hotel Industrial Complex portfolio that #ATXCouncil is amassing:

Hotel 1) <https://t.co/WgWq6I5lcz> Hotel 2) <https://t.co/inAvvOkBGX> Hotel 3) <https://t.co/uXd8mdaDvM>

Hotel 4) <https://t.co/IApIluMRu> *Paying close to twice appraised value: <https://t.co/OsG89OkjBR>
#TXLege

41. Jennifer Virden @Jennifer4Austin May 21, 2021 Blast from the Past: "We are smarter than the state legislature, as far as I can tell," Casar said in 2015. <https://t.co/IQdGezE5Jo> #TXLege #HB1900 #HB1925 #SB14 #SB23

42. Jennifer Virden @Jennifer4Austin May 22, 2021 Top 3 Bills following in #TXLege to deal w/#ATXCouncil: 1. #HB1900 Police - Placed on Senate Intent Calendar for 5/24. 2. #HB1925 Camping Ban - Passed final reading Senate (28-3), goes back to House to reconcile. 3. #SB23 Police - Placed on House General State Calendar for 5/24.

43. Jennifer Virden @Jennifer4Austin May 23, 2021  @MayorAdler struggles to answer why camping is allowed around Austin City Hall. #ClubMethCityHall <https://t.co/s3y6bXuSyt> via @LawrenceBJones3 #ATXCouncil #TXLege

44. Jennifer Virden @Jennifer4Austin May 26, 2021 Save Austin Now new Petition regarding the Police!   #ATXCouncil <https://t.co/tWrpKB1ywR> <https://t.co/waagGiQcfv>

45. Jennifer Virden @Jennifer4Austin May 28, 2021 Quite a few Democrats vote in favor of final vote on #HB1925 (Camping Ban) in the #TXLege State House. Another strong repudiation of @GregorioCasar's failed policy experiments in Austin. #ATXCouncil <https://t.co/JbV9T6T7sP> <https://t.co/rEr3AkezTx>

46. Jennifer Virden @Jennifer4Austin May 28, 2021 Top 3 Bills following in #TXLege to deal w/#ATXCouncil: 1. #HB1900 Police (municipal) - Headed to Gov. [@GregAbbott](#) TX's desk for signing. 2. #HB1925 Camping Ban - Headed to [@GovAbbott](#)'s desk for signing. 3. #SB23 Police (county) - Tied up in Conference Committee.

47. Jennifer Virden @Jennifer4Austin May 30, 2021 BIG Thanks Ed Fudman for making sure in 2020 we ran on a 20% Homestead Exemption. Fun radio ad @ <https://t.co/SXvBwtbxlr> on @NewsRadioKLBJ reminding the Mayor of 20% HEx he ran on in 2014. I support Item 71 (20%) & Item 72 on this week's Council agenda. Hope [@mkelly007](#) signs on! <https://t.co/wrZHsn2QAh>

48. Jennifer Virden @Jennifer4Austin Jun 1, 2021 Mackenzie Kelly and Leslie Pool just asked for their names to be added to the sponsors for Items 71 and 72, 20% Homestead Exemp. and Senior Exemp. increase. #ATXCouncil
49. Jennifer Virden @Jennifer4Austin Jun 2, 2021 #ATXCouncil #MUNY @UTAustin
<https://t.co/6V97877uoR>
50. Jennifer Virden @Jennifer4Austin Jun 2, 2021 It should be about 'Core Municipal Services,' not trying to solve EVERY problem of the WORLD. "We have a spending problem, not a money problem." - @ToddAndDonKLBJ Just heard that on KLBJ in response to Alter's saying we (#ATXCouncil) "need more money."  #taxandspend
51. Jennifer Virden @Jennifer4Austin Jun 2, 2021 I'LL JUST LEAVE THIS HERE. From yesterday's #ATXGov presentation to #ATXCouncil. Proposed costs of "a (1) hotel as a (1) protective lodge." They're calling this "bridge housing" not "permanent supportive housing" as part of the city's response to Prop. B, \$4.2M for 100 people: <https://t.co/UnmyVtN7Af>
52. Jennifer Virden @Jennifer4Austin Jun 2, 2021 Had a great time today working with a super sharp Cooper Baehr on his project dealing with the homeless issue. <https://t.co/kXzyj4lrZ1>
53. Jennifer Virden @Jennifer4Austin Jun 4, 2021 Totally disagree with 'guaranteed income' by the #ATXCouncil. It has NO place in responsible municipal budgeting. Municipal governments do not issue currency and money does not grow on trees. <https://t.co/HJHA1GGhbm> via @NewsRadioKLBJ #TXLeg
54. Jennifer Virden @Jennifer4Austin Jun 5, 2021 Rank Choice Voting? There were 5 bills in the #TXLeg dealing with the legal name "preferential voting." They all died. RCV/preferential voting requires action by the Secretary of State to prescribe procedures and that's probably not going to happen. ONWARD TO THE RUNOFF!
55. Jennifer Virden @Jennifer4Austin Jun 20, 2021 Yessss! I am now a proud patron of The Austin City Councilman Podcast on @patreon, and you should be too: #NewPatron <https://t.co/yGKSjgpmgz>
56. Jennifer Virden @Jennifer4Austin Jun 21, 2021 As Mayor of Austin beginning in 2022, I'm going to lead and keep Council focused on what we are charged to do: competently manage and fund core municipal services, such as APD/AFD/EMS, water, waste, electricity, roads, and parks. (1 of 3)
57. Jennifer Virden @Jennifer4Austin Jun 21, 2021
Regarding Muny, and our parks & nature preserves, there's a new, bona fide "Parks Lady" in town - me! I grew up in Austin & truly understand how our iconic parks & green spaces are a part of our DNA as Austinites - and I'm not just referring to neighborhood pocket parks. (2 of 3)
58. Jennifer Virden @Jennifer4Austin Jun 21, 2021
Let's maximize our attention to those things and minimize the virtue signaling resolutions overwhelming our City Manager. Let's do this in 2022!  (3 of 3)
59. Jennifer Virden @Jennifer4Austin Jun 25, 2021 Great work from Jerad @NajvarLaw in Federal Court today regarding an injunction on Austin's unconstitutional 1 year temporal window for candidate campaign contributions. #ATXCouncil <https://t.co/pdH7mkGNmr>
60. Jennifer Virden @Jennifer4Austin Jun 25, 2021 Pretty good coverage by @KXAN
<https://t.co/2CJGxqcHfc> h/t to @NajvarLaw
61. Jennifer Virden @Jennifer4Austin Jun 30, 2021 Rank Choice Voting in action. Thankfully still illegal in Texas. <https://t.co/U5LrnRlfkd> via @GregAbbott_TX <https://t.co/v5tSp3ZCUY>
62. Jennifer Virden @Jennifer4Austin Jul 1, 2021 ONWARD! #1stAmendment
<https://t.co/vkvMRGXc0e>
63. Jennifer Virden @Jennifer4Austin Jul 9, 2021 Watch the City budget process through August 11. Here's what the @AustinCityMgr is proposing now for APD. Full Document <https://t.co/vRYzregfyD>. The 'Big stick' #HB1900 having an impact. <https://t.co/iPXfIQZSaQ>
64. Jennifer Virden @Jennifer4Austin Jul 10, 2021 ADULTS IN CHARGE: Austin reverses course, City Manager proposes largest police budget yet <https://t.co/gEaVjqRyWw>
65. Jennifer Virden @Jennifer4Austin Jul 10, 2021 Employ some of the homeless for that. Pay them

more than \$15/hr for that. Don't be cheap, as with the lifeguards. <https://t.co/MFnIrlr0DHu>

66. **Jennifer Virden** @Jennifer4Austin Jul 13, 2021 CORE SERVICES: Should be a high priority what the Austin EMS is asking for here. "EMS union chief says city budget proposal inadequate" [#ATXCouncil](https://t.co/0ixQjIZSMq) @something_light <https://t.co/3cpzSK5Jf2>

67. **Jennifer Virden** @Jennifer4Austin Jul 13, 2021 Good written report by @TerriG_KVUE & @MollyAndAMic. The City of Austin received millions in federal grant money last year to address #homelessness. The KVUE Defenders show you where the City said that money went. <https://t.co/xTrRj1g5oH>

68. **Jennifer Virden** @Jennifer4Austin Jul 15, 2021 Love the after pictures, but they still need to get rid of the graffiti. This HEAL is a direct result of Prop. B and the 2020 campaign, otherwise policy would not have changed and the situation would have gotten worse. <https://t.co/yDpqtHYEd1> <https://t.co/5LCnsK0hw8>

69. **Jennifer Virden** @Jennifer4Austin Jul 17, 2021 LAST CALL on the @SaveATXNowPAC Police Petition. Collecting last signatures Sat. Sun. & Mon. July 17-19th. SAN turns it in on July 20th. Austin Thanks You! Petition at >> <https://t.co/vwgeBm8qBU> << Addresses given to hand deliver it to. (Too late to snail mail it)

70. **Jennifer Virden** @Jennifer4Austin Jul 18, 2021 AUDIT THE HIC IN AUSTIN? Number of good RT's coming on the HIC. For now, though, there is this from the COA, pointed out by @ghceorg yesterday. An audit has already been done, 2 years ago. #ATXCouncil Executive Summary: <https://t.co/Zjer8ul0Hz> Full Report: <https://t.co/s0ZFRllZ8N> <https://t.co/p4TFmA9oPg>

71. **Jennifer Virden** @Jennifer4Austin Jul 19, 2021 UNDER PRESSURE COA ANNOUNCES 2 SITES, 3 DAYS EARLY: Two Sites Identified as Possible Sanctioned Encampments for People Experiencing Homelessness <https://t.co/Zkwa6ovLBc> <https://t.co/BOJvsBtdOu>

72. **Jennifer Virden** @Jennifer4Austin Jul 20, 2021 DISGRACEFUL. #ATXCouncil Lady Bird Johnson is turning over in her grave. When I'm Mayor, this will be cleaned up. #ParksLady  <https://t.co/AbhzNB1H19>

73. **Jennifer Virden** @Jennifer4Austin Jul 28, 2021 Ha! That's funny! I got more votes in one election than Greg Casar has gotten in all of his [Council] elections put together?!   11,824 > 11,629 <https://t.co/pf3wNtS9lp> <https://t.co/cEX3DcEBYt>

74. **Jennifer Virden** @Jennifer4Austin Jul 31, 2021 YES. I still cannot forget all of the Council and Staff telling us to stop dripping out faucets and then backtracking on that a day or two later. Totally irresponsible. #ATXCouncil #Uri #trust <https://t.co/Ef75diOD0k>

75. **Jennifer Virden** @Jennifer4Austin Aug 3, 2021 This is UNACCEPTABLE. #ATXCouncil Spending far too much on rental assistance and not enough on EMS. <https://t.co/yuYeYYMpHu>

76. **Jennifer Virden** @Jennifer4Austin Aug 6, 2021 Jennifer Virden, Austin mayoral candidate: "What we should be looking for in our next chief of police is a person with integrity and previous experience as a police chief, and one who believes in how essential community policing is." <https://t.co/gA7ZprAaMU>

77. **Jennifer Virden** @Jennifer4Austin Aug 9, 2021 Darn Right! "Stop dripping your faucets!" #ATXCouncil    It Wasn't Just ERCOT: Task Force Slams City's Freeze Response <https://t.co/y0iR8agCf1> via @austinchronicle

78. **Jennifer Virden** @Jennifer4Austin Aug 9, 2021 "To this point, the mayoral race has two declared candidates: Realtor Jennifer Virden, a former Austin City Council candidate in District 10, and..." <https://t.co/jdtiMRQPi4>

79. **Jennifer Virden** @Jennifer4Austin Aug 11, 2021 Doesn't want to do the job she was elected to do. Already talking to people about the next elective office she might run for while not doing the one she's presently holding. #TXLege #ATXCouncil <https://t.co/9Em7ofcQ9V>

80. **Jennifer Virden** @Jennifer4Austin Aug 11, 2021 Light 'em up, Rupal!  #ATXCouncil

<https://t.co/iV2aoaK0Ge> <https://t.co/pX5ILhxah>

81. Jennifer Virden @Jennifer4Austin Aug 11, 2021 Adler's sophist lawyering. He can't resist doing this to every citizen proposition. "Beware the lawyer Mayor." #ATXCouncil #YESPropA <https://t.co/xYxtXtaW6o> <https://t.co/lOQ55PXttv>

82. Jennifer Virden @Jennifer4Austin Aug 12, 2021 When I'm your Mayor we will run the meetings no earlier than 9am and no later than 9pm. THATS IT! The City Manager @AustinCityMgr will have to adjust his agendas accordingly. #ATXCouncil <https://t.co/WklZILYi9R>

83. Jennifer Virden @Jennifer4Austin Aug 12, 2021 The article does not explain the 'estimated' \$119M a year is from a false assumption of 2.35 officers per 1,000, SAN Prop. A calls for 2 per 1,000. The article should have provided a link to the memo. <https://t.co/LqAK2m2Dz6> <https://t.co/Gz0ZjudYzY>

84. Jennifer Virden @Jennifer4Austin Aug 12, 2021 Local #TAX increases on dramatically increased property values will be a top issue in the 2022 election. Count on it. Passed on immediately to renters. #ATXCouncil

85. Jennifer Virden @Jennifer4Austin Aug 14, 2021 The ever rising property taxes are what drove them out, John-Michael, but the 'all or nothing' dysfunctional #ATXCouncil's inability to find compromise in addressing permitting and zoning improvements did not help either.

<https://t.co/1xBf4NEcua>

86. Jennifer Virden @Jennifer4Austin Aug 24, 2021 Polls close in 2 hours! ☺

<https://t.co/gvzVVdwMqC>

87. Jennifer Virden @Jennifer4Austin Aug 24, 2021 Virden polled 207 votes in getting 58% in her poll. Loewy polled 166 votes in getting 34.9% in his poll. That's a 55.5% vs. 45.5% votes comparison. ☺ ☺ ☺ #VoteforVirden2022 #ATXCouncil

88. Jennifer Virden @Jennifer4Austin Aug 27, 2021 Appeal brief filed with the 5th Circuit Federal Court of Appeals by @NajvarLaw challenging City of Austin's unconstitutional 1 year campaign contribution window. Much appreciate the hard work of Jerad Najvar at <https://t.co/89liKxwT90>. Full text: <https://t.co/7obqbSFMzU> #TXLege

89. Jennifer Virden @Jennifer4Austin Aug 29, 2021 Looking forward to #HB1925 being enforced at a minimum on state land starting Sept. 1, as the City of Austin is not enforcing voter passed Prop. B. Also looking forward to the evaluation that #HB1900 lays out starting Sept. 1. #TXLege c/o @JayLynn66873225: <https://t.co/wautlFdqZ2> <https://t.co/SXahS3hpg1>

90. Jennifer Virden @Jennifer4Austin Aug 30, 2021 KEY QUOTE: "Austin has one of the highest property taxes in the U.S., with #ATXCouncil raising taxes by 100% over a 13-yr period." High property tax increases result directly in higher monthly rents. Record supply is being built in the Austin MSA. (Census) <https://t.co/7wDdM3mbNv>

91. Jennifer Virden @Jennifer4Austin Aug 30, 2021 DISAPPOINTING: Adler's State of the City Address was defensive, accusatory, backward looking and revisionist. Spoke nothing of some of the big unaddressed policy issues. Shot of the small audience: <https://t.co/P5wPJU22mh>

92. Jennifer Virden @Jennifer4Austin Sep 1, 2021 I DO NOT agree that the city should designate new areas for outdoor public camping! Only Camp Esperanza. That's it. I DO NOT support ~\$100,000 PSH hotel rooms, they don't work. I DO support @mobileloaves and @toofound! #ATXCouncil thinking: <https://t.co/Mc11a9zd6N>

93. Jennifer Virden @Jennifer4Austin Sep 9, 2021 Nicely done! "Bresnens' HOMELESS CAMPING COMPLAINT TO @TXAG".pdf > <https://t.co/Uxi30KAh48>. ☺ @GregAbbott TX #TXLege #HB1925 <https://t.co/w6JlxslW7p>

94. Jennifer Virden @Jennifer4Austin Sep 11, 2021 Still trashed out at 183 and Great Hills, Braker, Duval, and Spicewood Springs/McNeil in Austin. #PropB #HB1925 #TXLege <https://t.co/v5WqZ2alVO>

95. Jennifer Virden @Jennifer4Austin Sep 17, 2021 155 items on the #ATXCouncil Sept. 30th Agenda. Is that some kind of irresponsible record? <https://t.co/PWQF4dY5WJ>

96. **Jennifer Virden** @_Jennifer4Austin Sep 21, 2021 Lady Bird Lake needs a SERIOUS CLEANING UP. Skimmers, etc. It's pathetic and grotesque. The City and **#ATXCouncil** waste millions of dollars on so many other things. Why can they not spend some money to clean up and keep Lady Bird Lake clean? <https://t.co/enPO2pRSG5>
97. **Jennifer Virden** @_Jennifer4Austin Oct 3, 2021 183 and Great Hills HIC bike chop shop back in business. New campsites at 183 and Great Hills, Braker, and Duval-on the north side. **#ATXCouncil** (1 of 3) <https://t.co/viZrp04I4I>
98. **Jennifer Virden** @_Jennifer4Austin Oct 5, 2021 "APD cadets forced to resign after contracting COVID-19." Wow, ~~LRH~~ @_Chief Chacon^{PDH}, really? Really!? How are you ever going to catch up even on budgeted staffing? **#ATXCouncil** <https://t.co/FqBsoeXGLH>
99. **Jennifer Virden** @_Jennifer4Austin Oct 5, 2021 NOTICED: Bob has been tweeting a lot recently against Austin Prop. A APD officer staffing levels...from *Giddings, Texas* ...hmm. ☺ <https://t.co/1kMnKTxBib>
100. **Jennifer Virden** @_Jennifer4Austin Oct 21, 2021 The City of Austin is notorious for not spending taxpayers' money on basic maintenance but instead spending it on all kinds of non-core social services, all the while saying there's not enough money to not only budget but fully APPROPRIATE & STAFF core svcs such as @Austin_Police <https://t.co/rEsKwkVSvR> <https://t.co/VqB08soXKs>
101. **Jennifer Virden** @_Jennifer4Austin Nov 1, 2021 PROGRESS...just in time for the election! All illegal camps and trash UNDER 183 North between Great Hills and Spicewood Springs-McNeil are cleaned up. Still camp and trash at Steck & MoPac. Citizen initiated Prop. B is working! LET'S DO THE SAME WITH PROP. A! **#VOTEFORPROPA!** <https://t.co/TNzTLMFwbr>
102. **Jennifer Virden** @_Jennifer4Austin Nov 3, 2021 Lots of review positions OPEN. Need to get those development permits MOVING. **#ATXCouncil** <https://t.co/aPlgkWaolT>
103. **Jennifer Virden** @_Jennifer4Austin Nov 3, 2021 IT'S ABOUT TIME. But will it be effective policies? **#ATXCouncil** gets moving with a hodgepodge of ideas to address Development Permitting, more housing, and the LDC - City of Austin Council Message Board <https://t.co/CxXnB571s> <https://t.co/Q6gNIPqV4I>
104. **Jennifer Virden** @_Jennifer4Austin Nov 5, 2021 APD budgeted staffing is way behind and needs to catch up: "Sponsored by CM @MK6ATX Kelly allows the city manager to authorize a third 'modified cadet class' of up to 30 already licensed peace officers... takes about four months to complete..." [#ATXCouncil](https://t.co/x4nEyHdExF)
105. **Jennifer Virden** @_Jennifer4Austin Nov 8, 2021 Starting Today: Support Jennifer Virden Campaign for Mayor. All in to Restore Austin. **#LoveAustin** <https://t.co/rlpb4hZzn9>
106. **Jennifer Virden** @_Jennifer4Austin Nov 8, 2021 Can do. Ready to spend. Adler did it, mostly with contributions. And the max donation per individual in a cycle is now \$400, no longer \$350. Every bit counts. <https://t.co/R4yfDAd9ML> <https://t.co/dKYJ7jz37m>
107. **Jennifer Virden** @_Jennifer4Austin Nov 9, 2021 All in to Restore Austin! **#LoveAustin** <https://t.co/R4yfDAd9ML>

April 9, 2021 – Virden was invited to and did speak at Westminster Austin Senior Living about City of Austin issues and the May 1, 2021 ballot measures. (Identified as a "policy forum" campaign event in response to interrogatory no. 3.)

Radio communications. Virden purchased radio advertisements on KLBJ related to the May 1, 2021 measure elections as follows: M-F 6a-10a 1 spot per day for 10 days (4/19-4/30); M-F 10a-11a 1 spot per day for 10 days (4/19-4/30)

Sat May 1 8a-11a 2 spots

These radio advertisements were discussed at ECF 13-1.

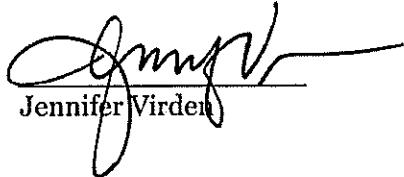
11. Identify any political advertising by you in connection with the November 2022 General Election for the period between December 16, 2020, and November 8, 2021.

Response:

All of the communications identified in response to interrogatory 10 constitute “political advertising” under Texas law. This includes the Facebook and Twitter posts, because even those posts not directly discussing Virden’s candidacy or a measure bear her campaign handle at the top of the post. *See Tex. Elec. Code § 251.001(16); see also 1 Tex. Admin. Code § 26.1.*

Verification

My name is Jennifer Virden. I am a plaintiff in this case. Pursuant to 28 U.S.C. § 1746, I hereby declare, under penalty of perjury under the laws of the United States, that the foregoing factual responses regarding my plans, intentions, and activity, are true and correct.



Jennifer Virden

Respectfully submitted,

/s/ Jerad Najvar

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document, and any accompanying exhibits and proposed order, were served on June 2, 2022, as follows:

Renea Hicks
Counsel for City of Austin

/s/ Jerad Najvar

Jerad Najvar